

# UNITED STATES DISTRICT COURT

U.S. MAGISTRATE COURT  
JSH - SDTX  
FILED

DEC 10 2012 DF

David J. Bradley, Clerk  
Laredo Division

United States of America  
v.  
VELIZ, Lazaro Yuced  
28 Years Old  
Miami, Florida

for the  
FPO 12/13/12  
det + ple 10AM  
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)  
)  
)  
)

Case No. 5:12mj1583

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12-08-2012 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

### Code Section

### Offense Description

Title 21 Section 841 A(1)

Knowingly and unlawfully posses with the intent to  
distribute a controlled substance listed under  
Schedule I, of the Controlled Substances Act, to  
wit, approximately 107.7 kilograms of Marijuana.

This criminal complaint is based on these facts:

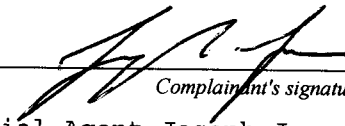
\*\*\*\*\* SEE ATTACHMENTS \*\*\*\*\*

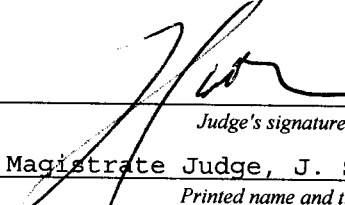
☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 12-10-2012

City and state: Laredo, Texas

  
Complainant's signature  
Special Agent Joseph Jones  
Printed name and title

  
Judge's signature  
U.S. Magistrate Judge, J. Scott Hacker  
Printed name and title

## CRIMINAL COMPLAINT

On December 8, 2012, USBP Agent Ozziel Zamora was working the United States Border Patrol checkpoint located at the 29 mile marker on Interstate Highway 35 north of Laredo, Texas. At approximately 3:55 a.m., a white International tractor and trailer approached his position at the primary inspection lane. Agent Zamora conducted an immigration inspection on the driver of the truck, who was later identified as VELIZ, Lazaro Yuced.

During the immigration inspection, VELIZ handed his Florida driver's license to Agent Zamora. Agent Zamora then asked where VELIZ was born, to which he replied "Cuba." Agent Zamora then asked if he was a Permanent Resident. VELIZ then provided his Permanent Resident card. Agent Zamora further questioned and asked what he was hauling in the trailer. VELIZ gave Agent Zamora his bill of lading which claimed the trailer had 50 lb. sacks of sugar. At that time, USBP Agent and canine handler Adrian Anzaldua advised Agent Zamora that his service canine "Cora-K" was alerting to the front end of the trailer for the presence of illegal contraband and/or concealed people. Agent Zamora then referred VELIZ to park at the secondary inspection area for further inspection.

Upon arriving to the secondary inspection area, VELIZ was instructed to park where the tractor and trailer could be scanned with the Vehicle and Cargo Inspection System (VACIS). After scanning the tractor and trailer, the image produced what appeared to be anomalies inside the pallets of sugar. At that time, USBP Agent Justin Medina used a pair of bolt cutters to cut off the seal in place. The driver also had the keys to a pad lock which was also placed on the door of the trailer as well. After opening the trailer, Agent Zamora went inside the trailer to further inspect the pallets of sugar at the front end. Upon reaching the front end of the trailer, he discovered four bundles wrapped in cellophane lying beside the pallets of sugar. The bundles contained a green leafy substance similar to the characteristics of marijuana. A field drug test was conducted which had positive results for marijuana.

DEA Special Agents advised VELIZ, Lazaro Yuced of his Miranda Warnings. He waived his right to have an attorney present and was willing to answer questions. VELIZ stated that he was in Laredo, TX about one month ago where he and his friend "Primo" met with an unknown male at the Flying J truck stop north of Laredo, TX. The unknown male provided him with a phone number to call to a person who was looking for truck drivers. "Moses" was the person who the phone number belonged to. VELIZ stated he called "Moses" about two weeks ago. "Moses" told VELIZ to come to Laredo, TX and gave him an address to a truck stop in Laredo, TX.

VELIZ further stated he then bought himself a plane ticket and flew from Miami, FL to Laredo, TX. He stated he arrived about 4-6 days ago to the airport in Laredo, TX. From there he took a taxi cab to the truck stop at the address "Moses" instructed him to go to. He stated the truck stop was located on Santa Maria near the train tracks. He further stated that "Moses" was the owner of the truck and company.

VELIZ stated he met with "Moses" at the truck stop where the tractor and trailer were located in the back parking lot. He stayed there for 4-5 days until he departed. When asked where he was going to take the load he stated he did not know the name of the town. He further stated he stayed in Laredo, TX at the truck stop because he had to do paperwork and take a urine analysis test for the company. VELIZ stated that the trailer was loaded at approximately 4:00 p.m. on 12-07-2012 at a warehouse in Laredo, TX. He did not know where in Laredo or the name of the warehouse, but stated it was on the bill of lading.

VELIZ further stated "Moses" sealed and locked the trailer at the warehouse. From the warehouse he went back to the Santa Maria truck stop. He stated from there he left at 1:45 a.m. VELIZ stated that when he left Laredo, TX, he stopped at the Flying J truck stop north of Laredo, TX. Initially he stated he did not have any money and stole two hot dogs at the truck stop. He later stated he stopped there to buy a log book. When questioned about the marijuana in the trailer, he stated he did not know about it and that this was his first trip with this company. Furthermore, VELIZ stated he bought a pre-paid cellular telephone about 15 days ago in which he did not know the number for.